

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

IN RE:	§	CASE NO. _____
	§	
EQUINO PROPERTIES, L.L.C.,	§	
DEBTOR.	§	CHAPTER 11

MOTION FOR AUTHORITY TO USE CASH COLLATERAL

THIS MOTION SEEKS A COURT ORDER THAT MAY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CAN NOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE PARTY. YOU MUST SERVE YOUR RESPONSE WITHIN 15 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

TO THE HONORABLE U.S. BANKRUPTCY JUDGE:

COMES NOW, Debtor, Equino Properties, L.L.C., and files this Motion for Authority to Use Cash Collateral, and in support thereof, shows:

Jurisdiction

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§157 and 1334. This is a core proceeding pursuant to 28 U.S.C & 157.

Background Facts

2. On the 2nd day of August, 2011, Debtor initiated this bankruptcy proceeding seeking protection under Chapter 11 of the Bankruptcy Code.

3. Pursuant to Section 1108, Debtor is authorized to operate their businesses as a debtors-in-possession under Section 1107.

4. Falcon Bank has a lien on An 18 Unit Apartment Complex situated at Lots 10, 11, and 12, Block 1572, ED, also known as Texas & Cleveland, Laredo, Webb County, Texas, which generate rental income.

Relief Requested

5. Pursuant to Sections 363, Bankruptcy Rule 4001(b)(1) and Local Bankruptcy Rule 4002(i), Debtor requests this Court to enter an order authorizing the use of cash collateral.

Arguments

6. Debtor contends that in order to have an effective reorganization, Debtor requires that it be authorized to use the Cash Collateral of Falcon International Bank in the reorganization process of this bankruptcy proceeding and for the necessary expenses of preserving this estate. Attached hereto as **Exhibit "A"**, is a budget under which Debtor intends to operate its business.

7. Should Debtor be the denied the use of cash collateral, Debtor's opportunity to have an effective reorganization will be impaired and will not have the ability to make an attempt to successfully reorganize.

WHEREFORE, PREMISES CONSIDERED, Debtor requests this Court to grant this Motion for Authority to Use Cash Collateral, and for any other and further relief, at law or in equity, to which Debtor may be justly entitled.

Respectfully submitted,

CAMPERO & ASSOCIATES, P.C.

By: /s/Adolfo Campero, Jr.
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ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

I, Adolfo Campero, Jr., do hereby certify that on this 2nd day of August, 2011, a true and correct copy of the foregoing motion was served by regular U.S. Mail, postage prepaid, facsimile, and/or by electronic means on the U.S. Trustee, Falcon International Bank, and to all other parties in interest.

/s/Adolfo Campero, Jr.
Adolfo Campero, Jr.